

1 ROBERT W. FREEMAN
Nevada Bar No. 3062
2 Robert.Freeman@lewisbrisbois.com
LEWIS BRISBOIS BISGAARD & SMITH LLP
3 6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
4 702.893.3383
FAX: 702.893.3789
5 *Attorneys for Defendants*

6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

9 ***

10 GONZALO RICO-PEREZ and CAROLINA
RICO, as the appointed special administrators
of the estate of GONZOLO RICO;
11 GONZOLO RICO-PEREZ; and CAROLINA
RICO,

12 Plaintiff,

13 vs.

14 CITY OF NORTH LAS VEGAS; RAMIN
15 NASSIRI; CHRISTOPHER COLWELL; and
DOES I-10, inclusive,

16 Defendants.
17

CASE NO. 2:19-cv-553-JAD-NJK

**DEFENDANTS' STIPULATION AND
ORDER FOR EXTENSION OF TIME TO
FILE A RESPONSE TO PLAINTIFFS'
COMPLAINT**

18 COME NOW, the parties, by and through their undersigned counsel of record and hereby
19 stipulate and agree that the time for City of North Las Vegas, Ramen Nassiri and Christopher
20 Colwell to file their response to Plaintiffs' Complaint, said response being due on April 22, 2019
21 be extended until May 22, 2019.

22 **Reason for Extension**

23 Because of the complexity of the claims made in Plaintiffs' Complaint, Defendants require
24 additional time to perform an investigation prior to filing a responsive pleading. This stipulation
25 is made in good faith and not for the purpose of delay.

26 ...

27 ...

28 ...

1 This is the first extension of time requested by counsel for filing Defendants response to
2 Plaintiffs' Complaint.

3 Dated this 15th day of April, 2019.

Dated this 15th day of April, 2019.

4 LEWIS BRISBOIS BISGAARD & SMITH LLP

LAW OFFICES OF PETER GOLDSTEIN

5 */s/ Robert W. Freeman*

/s/ Peter Goldstein

6 Robert W. Freeman, Esq.

Peter Goldstein, Esq.

7 Nevada Bar No. 3062

Nevada Bar No. 6992

Noel E. Eidsmore, Esq.

10795 West Twain Avenue, Suite 110

8 Nevada Bar No. 7688

Las Vegas, Nevada 89135

6385 S. Rainbow Blvd., Suite 600

Attorneys for Plaintiff

Las Vegas, Nevada 89118

Attorney for Defendants

10 **ORDER**

11 IT IS SO ORDERED.

12 Dated this 15 day of April, 2019.

14 
15 UNITED STATES MAGISTRATE JUDGE